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8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 DAVID STROJ et. al,

14 Defendants.

Criminal Case No. 15cr2932-H

PROTECTIVE ORDER

15 Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure pertaining to  
16 pretrial discovery, and to prevent premature disclosure of evidence to other targets,  
17 subjects, and witnesses of ongoing investigations,

18 IT IS HEREBY ORDERED that the defendant, counsel of record, and the  
19 counsel's assistants, as hereafter defined, shall not disclose the substance of any  
20 discovery material received from the Government in the above-captioned matter,  
21 including all Title III documents, to any third party, unless such material is already a  
22 matter of public record, without prior approval of this Court;

23 Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure,

24 IT IS FURTHER ORDERED that the United States Attorney and the Assistant  
25 United States Attorney assigned to this case (hereafter collectively referred to as "the  
26 Government") and their assistants, the defendant, counsel of record and counsel's  
27 assistants, shall not disclose the substance of any discovery material produced to the  
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1 defendant or obtained by the Government from the defendant, unless such material is  
2 already a matter of public record, to representatives of the media or other third parties not  
3 involved in any way in the investigation or prosecution of the case;

4 Except that nothing contained herein shall prevent the Government, or any  
5 defendant or counsel of record, from disclosing such discovery material to any other  
6 attorneys working for the Government, the defendant or counsel of record, government  
7 agents (federal, state or local), private investigators, experts, secretaries, law clerks,  
8 paralegals, or any other person who is working for the Government or the defendant and  
9 counsel of record (collectively referred to as "assistants") in the investigation or  
10 preparation of this case or, with respect to the Government and its assistants only, in  
11 other criminal investigations, without prior court order;

12 Further, nothing contained herein shall preclude the Government, defendant or  
13 counsel of record, or respective assistants from conducting a normal investigation of the  
14 facts of this case on behalf of the Government or said defendant, or with respect to the  
15 Government and its assistants only, from conducting an investigation of other criminal  
16 activity, including interviewing witnesses disclosed by said discovery materials, or from  
17 taking statements from witnesses disclosed by said discovery materials, or from asking  
18 said witnesses if they themselves have made prior statements to the Government that are  
19 disclosed in the discovery materials, and about the contents of such statements. In  
20 connection with any such investigation, it shall not be necessary that the Government, the  
21 defendant or counsel of record, or counsel's respective assistants, obtain prior permission  
22 of this Court.

23 Should counsel withdraw or be disqualified from participation in this case, any  
24 material received and any copies derived therefrom, shall be returned to the Government  
25 within ten (10) days.

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1 Defense counsel and the Government shall be required to communicate the  
2 substance of this order and explain it to the client and assistants before disclosing the  
3 substance of the discovery to the client or assistants.

4 SO ORDERED.

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6 DATED: \_\_\_\_\_, 2016

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7 THE HON. MARILYN L. HUFF  
8 UNITED STATES DISTRICT JUDGE  
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